



Rehabilitation Engineering Research Center on Mobile  
Wireless Technologies for Persons with Disabilities

**Wirelessrerc.org**

250 14<sup>th</sup> Street, NW Room 541  
Atlanta, GA 30318-0490

ph: (404) 894-8297  
TDD/TTY: (404) 894-6568  
Fax: (404) 894-1445

**VIA ECFS**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
TW-A325  
Washington D.C. 20554

Re: *Telecommunications Relay Service and Speech-to-Speech Services for  
Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67  
*Americans with Disabilities Act* of 1990, CG Docket No. 03-123

Dear Ms. Dortch:

Enclosed for filing in the above referenced proceeding pursuant to the Commission's June 17, 2003 Notice of Proposed Rulemaking ("TRS NPRM"), are the Reply Comments of the Rehabilitation Engineering Research Center on Mobile Wireless Technologies for Persons with Disabilities (Wireless RERC) to the Comments of Telecommunications for the Deaf, Inc., American Association of People with Disabilities, National Association of the Deaf, Deaf and Hard of Hearing Consumer Advocacy Network, Association of Late-Deafened Adults, and Self Help for Hard of Hearing People, submitted pursuant to the TRS NPRM.

Should you have any questions concerning this filing, please do not hesitate to call me.

Respectfully submitted,

Helena Mitchell, Director *in consultation with*  
Paul M.A. Baker, Associate Director, Policy Research  
Rehabilitation Engineering Research Center on Mobile Wireless Technologies for Persons with  
Disabilities (Wireless RERC)

Dated this 9th day of October, 2003

Enclosure

**Before the  
Federal Communications Commission  
Washington D.C. 20554**

Telecommunications Relay Service and	)	CC Docket No. 98-67
Speech-to-Speech Services for Individuals	)	
with Hearing and Speech Disabilities	)	
	)	
	)	
Americans With Disabilities Act of 1990	)	CG Docket No. 03-123
	)	

**REPLY COMMENTS OF  
REHABILITATION ENGINEERING RESEARCH CENTER ON MOBILE WIRELESS  
TECHNOLOGIES FOR PERSONS WITH DISABILITIES (WIRELESS RERC)**

The Rehabilitation Engineering Research Center on Mobile Wireless Technologies for Persons With Disabilities (Wireless RERC), in accordance with the Commission’s Notice of Proposed Rulemaking<sup>1</sup>, hereby submits reply comments on the comments submitted by Telecommunications for the Deaf, Inc. (“TDI”), American Association of People with Disabilities, National Association of the Deaf, Deaf and Hard of Hearing Consumer Advocacy Network, Association of Late-Deafened Adults, and Self Help for Hard of Hearing People, (“TDI, et. al.”) to the TRS NPRM.

The Wireless RERC<sup>2</sup> is a research center focusing on promoting universal access to mobile wireless technologies and exploring their innovative applications in addressing the needs of people with disabilities.

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<sup>1</sup> *In the Matter of Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Americans With Disabilities Act of 1990*, CC Docket No. 98-67, CG Docket No. 03-123, Second Report and Order, Order on Reconsideration, and Notice of Proposed Rulemaking (NPRM) FCC 03-112 (June 17, 2003) (“TRS NPRM”).

<sup>2</sup> The Rehabilitation Engineering Research Center on Mobile Wireless Technologies for Persons with Disabilities (Wireless RERC) is supported by the National Institute on Disability and Rehabilitation Research of the U.S. Department of Education, grant # H133E010804.

In the initial round of comments, TDI, et. al, filed comments on the Commission's NPRM on technological and other issues surrounding the routing of wireless 711 calls.<sup>3</sup> TDI, et. al., commented that affected parties should work together to develop the means through which emergency calls (via 711, 911 or a directly dialed number) to a TRS center are routed through to the same Public Safety Answering Point (PSAP) that would receive a directly dialed 911 call. They argued that wireless subscribers with speech or hearing disabilities should have the same expectations of level of service (handling via PSAP) when placing emergency calls that hearing wireless subscribers currently have, regardless of origination via 711, 911 or directly called numbers. The Wireless RERC believes that TDI et. al, make an important point regarding parity of service. We agree that as technology becomes available, wireless carriers should be required to provide 911/E911 information to TRS providers so that information can be passed along to the appropriate PSAP. We further agree that wireless providers should be required to provide the same 911/E911 information to TRS users that they provide for speaking/hearing subscribers.

Additionally the Wireless RERC concurs with TDI, et. al., that the Commission consider mandating that TRS vendors designate e-mail addresses for their facilities so that emergency messages may be sent via wireless text devices, and that those messages be directed to the appropriate PSAP. This is especially important for deaf people who may be users of text pagers and need a method to communicate in an emergency situation.<sup>4</sup> We agree that current technology is sufficiently developed that it would be reasonable for the Commission to consider investigating the feasibility of requiring that pagers with Internet browsers be able to connect with IP Relay in order to contact hearing parties and other emergency services.

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<sup>3</sup> *TRS NPRM*, at ¶ 108-109.

<sup>4</sup> The use of text pagers in this context could provide "equivalent functionality or outcome" per *TRS NPRM*, at ¶ 109. As TDI, et. al point out it would allow a call for "help," similar to a hearing person's use of a cell phone.

The Telecommunications Act of 1996 made provisions to provide persons with disabilities access to tools that would ensure they had access to emergency services. It is therefore important for the Commission to be sensitive in establishing and supporting emergency communications systems that can effectively assist persons with disabilities thus avoiding injury or loss of life.

Respectfully submitted,

Helena Mitchell, Director  
Rehabilitation Engineering Research Center on Mobile  
Wireless Technologies for Persons with Disabilities (Wireless RERC)  
250 14th Street, NW, Room 541  
Atlanta, GA 30318-0490

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(Former FCC Chief of the Emergency Broadcast System and  
The Emergency Alert System)

Dated this 9th day of October, 2003